



U.S. Department of Energy
Office of River Protection

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

0063104

NOV 08 2004

04-ED-096

Mr. A. W. Conklin, Head
Air Emissions and Defense
Waste Section
State of Washington
Department of Health
P.O. Box 47827
Olympia, Washington 98504

RECEIVED
NOV 23 2004
EDMC

Dear Mr. Conklin:

PROPOSED CHANGES TO "WASHINGTON STATE DEPARTMENT OF HEALTH CODE COMPLIANCE MATRIX FOR LOW-ACTIVITY WASTE HEATING, VENTILATION AND AIR CONDITIONING SYSTEMS" (24590-WTP-RPT-ENG-02-001, REV. B) – IN-BLEED BACKDRAFT DAMPER

Reference: WDOH letter from A. W. Conklin to J. E. Rasmussen, ORP, "Notice of Construction Approval for Construction of (WTP) LAW Vitrification Plant," AIR 03-1014, dated October 22, 2003.

Provided with this letter for your review and approval is a deviation request form describing a proposed change to the State of Washington Department of Health Code Compliance Matrix (CCM) for the Low-Activity Waste (LAW) Heating, Ventilation and Air Conditioning Systems.

The attached deviation request form provides the technical justifications for a minor revision to the LAW CCM for the non-bubble tight in-bleed backdraft dampers from the American Society of Mechanical Engineers Code on Nuclear Air and Gas Treatment Systems to Air Movement and Control Association 500 standard. This deviation will allow the LAW in-bleed backdraft dampers to be qualified to commercial industry standards consistent with the current Radioactive Air Emissions Notice of Construction Approval (Reference).

If you have any questions, please contact me, or your staff may contact Dennis W. Bowser, Environmental Division, (509) 373-2566.

Sincerely,


Roy J. Schepens
Manager

ED:DWB

Attachment

cc: See page 2

Mr. A. W. Conklin
04-ED-096

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cc w/attach:

B. G. Erlandson, BNI
R. D. Haggard, BNI
C. J. Kemp, CH2M HILL
J. Cox, CTUIR
S. Harris, CTUIR
B. Becker-Khaleel, Ecology
S. L. Dahl, Ecology
J. L. Hensley, Ecology
O. S. Wang, Ecology
J. A. Bates, FHI
W. E. Green, Jr., FHI
P. Sobotta, NPT
K. Niles, Oregon Energy
M. F. Jarvis, RL
R. Jim, YN
J. Martell, WDOH Richland Office
Administrative Record
CH2M Correspondence Control
Environmental Portal, LMSI

Attachment
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Deviation Request Form for LAW In-Bleed Backdraft Damper



Deviation Request Form

Page 1 of 1

Deviation Request Number: 24590-LAW-WHDR-HV-04-0002 Rev. 0		Final Status: <input type="checkbox"/> Approved			
Subject: LAW In-Bleed Back Draft Damper		<input type="checkbox"/> Rejected			
Request Date: 10/17/04	Requestor: Dan Cragin				
Phone Number: 371-3728	Organization: HVAC				
Deviation Description - Completed by Requestor					
<i>Provide the requirement number and text of the requirement from which a deviation is requested (if necessary, attach additional sheets):</i> ASME AG-1, Section DA					
<i>Provide technical justification for the deviation request. Document any conditions of acceptance of factors which may help to preserve the intent of the requirement (if necessary, attach additional sheets):</i> The LAW Facility in-bleed dampers between the C2/C3 and C5 areas will be qualified per AMCA 500. These test requirements are consistent with ASME AG-1, Section DA, Sub-Articles 5700, 5710, and 5742. In addition, the AMCA 500 qualification is in accordance with the Radioactive Air Emissions Notice of Construction (Rad-NOC) Approval (AIR 03-1014, NOC ID511) condition number 45 for EU ID 550. No other requirements identified in ASME AG-1 will be met. During normal operation, air travels through the in-bleed back draft damper from the C2/C3 area (less contamination) to the C5 area (greater contamination). LAW C5 (EU ID 550, LV-S2) and C2 (EU ID 548, LV-C2) exhaust streams are HEPA filtered and monitored in accordance with the Rad-NOC Approval (AIR 03-1014). During the loss of the C5 ventilation system, the C2 ventilation system will shut down on interlock. The in-bleed back draft damper will close on loss of differential pressure and limit the amount of air that could travel back from the C5 area to the C2/C3 areas.					
Change Category:	<input type="checkbox"/> ITS	<input type="checkbox"/> Major	<input checked="" type="checkbox"/> Minor		
Classification (If Major):	<input type="checkbox"/> Class I	<input type="checkbox"/> Class 2	<input type="checkbox"/> Class 3		
<i>Comments/Conditions on Acceptance (if necessary, attach additional sheets):</i>					
Deviation Request Concurrence					
Required:	Name:	Signature:	Date:	Accept	Reject
<input checked="" type="checkbox"/> Vista Eng.	Jim Kriskovich		10/20/04	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> Resp. Eng.	Will Lawrence		10/20/04	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> Central Eng.	Dan Cragin		10/20/04	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> E&NS	Jennifer Su-Coker		10/20/04	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> WDOH				<input type="checkbox"/>	<input type="checkbox"/>